## In the Supreme Court of the United States

JADE JOSEPH NICKELS, PETITIONER,

v.

DREW EVANS, SUPERINTENDENT, BUREAU OF CRIMINAL APPREHENSION

## **CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the accompanying Reply Brief for the Petitioner contains 2,823 words, excluding the parts of the document that are

exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 23, 2024.

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